



LAW OFFICE OF
MICHAEL K. BACHRACH
276 FIFTH AVENUE, SUITE 501
NEW YORK, N.Y. 10001
TEL. (212) 929-0592 • FAX. (866) 328-1630

MICHAEL K. BACHRACH*
* admitted in N.Y., MN and D.C.

<http://www.mbachlaw.com>
michael@mbachlaw.com

February 24, 2020

By ECF
Hard copy to follow by mail

The Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

2/26/2020
Request (✓) Granted
Sordered

Re: United States v. Tagliaferro, et al.
19 Cr. 472 (PAC)

Paul A. Crotty
USH

Dear Judge Crotty:

I, along with Richard Rosenberg, represent Salvatore Tagliaferro in United States v. Tagliaferro, 19 Cr. 472 (PAC), and write to respectfully request a modification of Mr. Tagliaferro's pretrial conditions of release.

Mr. Tagliaferro requests permission to travel to Ocala, Florida, to attend the funeral of his sister-in-law's mother, Dolores Sorrentino. Specifically, Mr. Tagliaferro requests permission to fly to Orlando, Florida, this Thursday, February 27, 2020, returning to New York on Sunday, March 1, 2020. The funeral will take place on Friday, February 28, 2020, in the East Chapel of Roberts Funeral Homes in Ocala, Florida, which Mr. Tagliaferro will drive to from Orlando.

I have spoken with Pretrial Services Officer Keyana Pompey and been informed that Pretrial Services has no objection to the instant application. I have also spoken with Assistant United States Attorneys Thomas McKay and Jarrod Schaefer who informed both me that the Government defers to Pretrial Services and likewise has no objection.

Accordingly, Defendant Salvatore Tagliaferro, by and through counsel, respectfully requests a modification of Mr. Tagliaferro's pretrial conditions of release to permit him to travel to and from New York and Florida from Thursday, February 27, 2020, through Sunday March 1, 2020.

Thank you for your time and consideration.

The Hon. Paul A. Crotty
February 24, 2020
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Respectfully submitted,

/S/

Michael K. Bachrach
Attorney for Defendant Salvatore Tagliaferro

cc: All parties of record (by ECF)
PTS Officer Keyana Pompey (by email)